

# **EXHIBIT A**

## **Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
Center City Healthcare, LLC d/b/a Hahnemann University Hospital, <i>et al.</i> ,	:	Case No. 19-11466 (MFW)
	:	
Debtors.	:	Jointly Administered
	:	
-----	:	
Center City Healthcare, LLC d/b/a Hahnemann University Hospital, Philadelphia Academic Health System, LLC, St. Christopher's Healthcare, LLC, Philadelphia Academic Medical Associates, LLC, HPS of PA, L.L.C., SCHC Pediatric Associates, L.L.C., St. Christopher's Pediatric Urgent Care Center, L.L.C., SCHC Pediatric Anesthesia Associates, L.L.C., StChris Care at Northeast Pediatrics, L.L.C., TPS of PA, L.L.C., TPS II of PA, L.L.C., TPS III of PA, L.L.C., TPS IV of PA, L.L.C. and TPS V of PA, L.L.C.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Proceeding No. 21-50912 (MFW)
	:	
HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC,	:	
	:	
Defendant.	:	

**ORDER APPROVING STIPULATION EXTENDING TIME FOR  
HRE CAPITAL, LLC F/K/A HEALTHCARE REAL ESTATE CAPITAL, LLC  
TO RESPOND TO THE COMPLAINT**

Upon consideration of the *Stipulation Extending Time for HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC to Answer Complaint* (the “Stipulation”), a copy of which is attached hereto as **Exhibit 1**; and the Court having determined that good and adequate cause exists for approval of the Stipulation; and the Court having determined that no further notice of the Stipulation must be given; it is hereby ORDERED that the Stipulation is hereby APPROVED.

## **EXHIBIT 1**

**Stipulation Extending Time for HRE Capital, LLC f/k/a Healthcare Real  
Estate Capital, LLC to Respond to Complaint**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
Center City Healthcare, LLC d/b/a Hahnemann University Hospital, <i>et al.</i> ,	:	
	:	Case No. 19-11466 (MFW)
Debtors.	:	Jointly Administered
-----	:	
Center City Healthcare, LLC d/b/a Hahnemann University Hospital, Philadelphia Academic Health System, LLC, St. Christopher's Healthcare, LLC, Philadelphia Academic Medical Associates, LLC, HPS of PA, L.L.C., SCHC Pediatric Associates, L.L.C., St. Christopher's Pediatric Urgent Care Center, L.L.C., SCHC Pediatric Anesthesia Associates, L.L.C., StChris Care at Northeast Pediatrics, L.L.C., TPS of PA, L.L.C., TPS II of PA, L.L.C., TPS III of PA, L.L.C., TPS IV of PA, L.L.C. and TPS V of PA, L.L.C.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Adv. Proceeding No. 21-50912 (MFW)
HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC,	:	
	:	
Defendant.	:	

**STIPULATION EXTENDING TIME FOR HRE CAPITAL, LLC F/K/A HEALTHCARE  
REAL ESTATE CAPITAL, LLC TO RESPOND TO COMPLAINT**

NOW COMES the above-captioned plaintiffs (collectively, the “Plaintiffs”) and defendant HRE Capital, LLC f/k/a Healthcare Real Estate Capital, LLC (the “Defendant”), by and through their undersigned counsel, and hereby stipulate, subject to approval of the Court, that the deadline for Defendant to answer, plead or otherwise respond to the *Complaint for Avoidance and Recovery of Fraudulent Transfer Pursuant to 11 U.S.C. §§ 548 & 550* [Adv. D.I. 1] is extended through and including November 1, 2021.

Dated: September 27, 2021

**SAUL EWING ARNSTEIN & LEHR LLP**

/s/ Mark Minuti

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Healthcare Real Estate Capital, LLC*